loss on the original parties. *Knickerbocker* v. *McKindley Coal & Mining Co.*, 67 Ill. App. 291. So the directors of a corporation may look to the shareholders for reimbursement. *Ex parte Chippendale*, 4 De G. M. & G. 19. Such is also the rule between trustee and *cestui que trust*. *Hardoon* v. *Belilios*, [1901] A. C. 118. It is submitted that the true basis of the receiver's right is quasi-contractual, for money paid to the use of the parties, the recovery depending on the necessity and expediency of his acts. On this ground the decisions could also be reconciled.

RECORDING AND REGISTRY LAWS — WHAT CONSTITUTES RECORDING — WRONG INITIAL OF MORTGAGOR'S MIDDLE NAME FATAL TO NOTICE. — W. N. McDonald executed a chattel mortgage, signing it "W. H. McDonald." *Held*, that the recording of this mortgage was not constructive notice to a subsequent *bonâ fide* purchaser from W. N. McDonald. *First National Bank of Opp* v. *Hacoda Mercantile Co.*, 53 So. 802 (Ala.).

A misunderstanding of the phrase "A man cannot have two names of baptism" has led to a strange confusion of reasoning in many of the modern cases. *Cf. Nolan* v. *Taylor*, 131 Mo. 224; *Franklin* v. *Talmadge*, 5 Johns. (N. Y.) 84. The old common law recognized no *alias* of a person's Christian name. BROOKE, ABR., "Misnomer," 2, 4; CO. LIT. 3 a; *Fermor* v. *Dorrington*, Cro. Eliz. 222; *Rex* v. *Newman*, 1 Ld. Raym. 562. The conception was simply that at baptism a person received once and for all the Christian name or names, and any subsequent addition or substitution could not be a name "of baptism." See VINER'S ABR., "Misnomer," C. 6, pl. 5, 6. It may even be doubted whether the rule was as strict as this. See *Bearbrook* v. *Read*, 1 Brownl. & G. 47; *Walden* v. *Holman*, 6 Mod. 115; BACON'S LAW TRACTS 106. But there is no authority for the frequently repeated statement that the old common law did not recognize a person's middle Christian name. Hence, in any legal situation, where a person's name is of importance, it should first be recognized that his exact name does include the middle Christian name. *Commonwealth* v. *Perkins*, 18 Mass. 388; *Bowen* v. *Mulford*, 10 N. J. L. 230. But if the identity can be otherwise satisfactorily determined, it may be unnecessary to require that the exact name be used. See *Commonwealth* v. *Shearman*, 65 Mass. 546. However, taking into consideration the purpose of recording statutes, and the absence, apart from the record, of means of identifying the parties, the principal case seems clearly right and is supported by the weight of authority. *Crouse* v. *Murphy*, 140 Pa. St. 335; *Johnson* v. *Wilson & Co.*, 137 Ala. 468. *Contra*, *Fincher* v. *Hanegan*, 59 Ark. 151; *Geller* v. *Hoyt*, 7 How. Pr. (N. Y.) 265.

RESTRAINT OF TRADE — SHERMAN ANTI-TRUST ACT — CONSPIRACY A CONTINUING OFFENSE. — The defendants were indicted for a conspiracy in restraint of trade in violation of the Sherman Act. Their plea of the Statute of Limitations put in issue whether or not a conspiracy is a continuing offense. *Held*, that a conspiracy is a continuing offense. *United States* v. *Kissel*, U. S. Sup. Ct., Dec. 12, 1910.

The question of what constitutes a conspiracy has frequently come up under a federal statute making a conspiracy to defraud the government and an overt act in accordance therewith an indictable offense. U. S. REV. STAT., 1878, § 5440. Several decisions have held that the conspiracy is merely the agreement to defraud, so that if the limitation period has elapsed since the commission of an overt act in accordance with this agreement the defendants can no longer be indicted, though they have committed subsequent overt acts. *United States* v. *Owen*, 32 Fed. 534; *United States* v. *McCord*, 72 Fed. 159. Other cases hold that a conspiracy is a continuing offense, consequently an indictment is maintainable if any overt act has been committed within the statutory period. *United States* v. *Bradford*, 148 Fed. 413; *United States* v.